

Jeff Hatfield  
273 Crestview  
Commerce Township, MI 48390  
(248) 924-4376

In the District Court of Michigan in  
the county of Oakland

Malibu Media, LLC.

Plaintiff

vs.

Jeff Hatfield

Defendant(s)

)Case No.: 2:18-cv-11033-MAG-MKM  
)ANSWER, AFFIRMATIVE DEFENSES

**FILED**  
**SEP 17 2018**  
CLERK'S OFFICE  
DETROIT

I. ANSWER

Defendant(s) answer the complaint as follows:

1. Admit the statements contained in paragraph numbers 1, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 27, 28,
2. Deny the statements contained in paragraph numbers 2, 20, 23, 25, 30, 31, 32, 33,
3. Lack knowledge about the truth and therefore deny the statements contained in paragraphs numbers 3, 5, 6, 17, 18, 19, 21, 22, 24, 26, 29,

II. AFFIRMATIVE DEFENSES

Defendant(s) other defenses are:

In the course of my business-related activities I do maintain a BitTorrent client at the aforementioned IP address. However, that client is not for the purpose of downloading or distributing copyrighted works. The BitTorrent client in question is used to search and download malware and virus infected files for the purpose of study. From time to time, I scrape known torrent trackers for random samples of files. As the files download I am scanning for signs of malware, viruses and ransomware. Clean files are deleted immediately and infected files have the malware stripped for study.

That BitTorrent client never has all the pieces of any file available for download.

At times customers, family and/or friends deliver their computers to me after malware infections for cleaning and repair. It is possible that those computers would have BitTorrent clients as well (explaining the infections) and I do not track any information that may be on those computers - my job is to remove infections and while I would typically shutdown any BitTorrent client during my process, it would certainly be online and connectable while I am troubleshooting.

Dated this September 11, 2018



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8 Malibu Media, LLC.

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10 vs.

11 Jeff Hatfield

12 Defendant(s)

) Case No.: 2:18-cv-11033-MAG-MKM

)

) PRO SE NOTICE OF APPEARANCE

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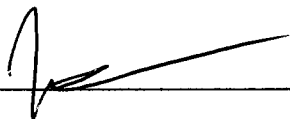
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13  
14  
15 The undersigned enters an appearance in this action, and  
16 demands notice of all further proceedings. The Clerk of  
17 Court and the opposing party will be informed of any changes  
18 in address. Any and all notices may be sent to:

19 Service Address:

20 273 Crestview, Commerce Township, MI 48390  
21  
22  
23

24 Dated this September 11, 2018

25  
26 

27 Jeff Hatfield  
28

1 Jeff Hatfield  
2 273 Crestview  
3 Commerce Township, MI 48390  
4 (248) 924-4376  
5

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14

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)CERTIFICATE OF SERVICE

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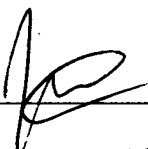
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15 **CERTIFICATE OF SERVICE**

16 I certify under penalty of perjury under the laws of the  
17 State of Michigan that, on the date stated below, I did the  
18 following:

19 On the day of September 11, 2018, I mailed by Certified  
20 Mail, Return Receipt, postage pre-paid, a true copy of the  
21 Notice of Appearance and the Answer, Affirmative Defenses to  
22 Malibu Media, LLC. at the offices of Joel A. Bernier at the  
23 following address: 49139 Shoenherr, Shelby Township, MI  
24 48315

25 Dated this September 11, 2018,  
26 in the city of Commerce  
27 Township, MI  
28

29   
30 \_\_\_\_\_  
31 Jeff Hatfield

Jeff Hatfield  
273 Crestview Blvd.  
Commerce Township, MI 48390

**CERTIFIED MAIL®**



7018 0360 0000 2430 2729

U.S. POSTAGE PAID  
FCM LETTER  
WALLED LAKE, MI  
48390  
SEP 12, 18  
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**\$3.95**

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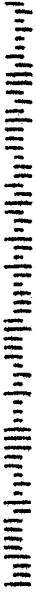
CLERKS OFFICE  
U.S. DISTRICT COURT

SEP 17 2018

**RECEIVED**

United States District Court  
Eastern District of Michigan  
Theodore Levin U.S. Courthouse  
231 W. Lafayette Blvd.  
Detroit, MI 48226

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9/12/18 *noted*

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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE